



February 26, 2010

Filed Electronically via ECFS

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, DC 20554

**Re: Annual 47 CFR §64.2009(e) CPNI Certification
EB Docket No. 06-36**

Dear Secretary Dortch:

On behalf of our client, the Development Authority of the North Country (DANC), we transmit herewith DANC's 2010 annual CPNI compliance certification and accompanying statement of procedures for the year ended 31 December 2009, in accordance with 47 CFR §64.2009(e).

Very truly yours,

Hage & Hage LLC

A handwritten signature in blue ink that reads 'J.K. Hage III'. The signature is stylized and fluid, with a long horizontal stroke at the end.

J.K. Hage III

JKH:amc

Enclosures

cc: James W. Wright, Executive Director
Development Authority of the North Country

Best Copy and Printing, Inc. (via email)

J.K. Hage III

Admitted in New York & Alaska

jk@hagelaw.com

www.hagelaw.com

283 Genesee Street

Utica NY 13501-3805

Phone 315.797.9850

Fax 315.797.1721

Innovation in Practice

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

2010 Annual 64.2009(e) CPNI Certification covering calendar year 2009

Date filed: February 26, 2010

Name of company covered by this certification: Development Authority of the North Country

Form 499 Filer ID: 823896

Name of signatory: James W. Wright

Title of signatory: Executive Director

I, James W. Wright, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review).

The company has not taken any actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed: _____

James W. Wright, Executive Director
Development Authority of the North Country

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2009

EB Docket No. 06-36

STATEMENT OF PROCEDURES

Development Authority of the North Country, Form 499 Filer ID No. 823896 ("Company") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of consumer proprietary network information ("CPNI").

- Company has implemented a system whereby the status of a customer's CPNI approval can be established prior to the use of CPNI.
- Company has implemented a system whereby it educates and trains its employees regarding the appropriate use of CPNI. Company has established disciplinary procedures should an employee violate the CPNI procedures established by Company.
- Company has implemented a system whereby it maintains a record of its sales and marketing campaigns that use its customers' CPNI. Company also has implemented a system whereby it maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. These records are maintained for a minimum of one year.
- Company has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of Company compliance for a minimum period of one year. Specifically, Company's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.
- Company has implemented a notification process for both law enforcement and customers in the event of a CPNI breach.